

EXHIBIT N PUBLIC VERSION

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PURDUE RESEARCH FOUNDATION,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 6:22-cv-00119-ADA

JURY TRIAL DEMAND

PLAINTIFF’S PRELIMINARY INFRINGEMENT CONTENTIONS

Pursuant to the Court’s Standing Order Governing Proceedings (Dkt. 10), Plaintiff The Trustees of Purdue University hereby serves its Preliminary Infringement Contentions regarding U.S. Patent No. 10,379,925 (“’925 Patent”). Plaintiff’s analysis is preliminary and based largely on publicly available information; therefore, Plaintiff reserves the right to supplement, amend, or modify these contentions following discovery from Defendant and third parties, additional investigation, or rulings by the Court (including claim construction).

I. Asserted Claims

Plaintiff alleges that Defendant directly infringes (literally or under the doctrine of equivalents) at least claim 1 of the ’925 Patent under 35 U.S.C. § 271(a) by making, using, selling, and/or offering for sale, in the United States, Android Studio and Android Lint—a software package distributed with Android Studio and for independent use (the “Accused Instrumentalities”).

Plaintiff further contends that Defendant indirectly infringes at least claim 1 of the ’925 Patent under 35 U.S.C. § 271(b) by actively and knowingly inducing, directing, causing, and/or encouraging others to infringe the ’925 Patent by using the Accused Instrumentalities in the United

States. Plaintiff contends that Defendant actively and knowingly induces infringement by others by, *inter alia*, (i) providing the Accused Instrumentalities, (ii) allowing others to utilize the Accused Instrumentalities to infringe, and/or (iii) providing manuals and guides, technical documentation, technical support and assistance, advertisements, and marketing. For example, Defendant directs developers, users, or customers to download the Android Studio application on its website and further provides instructions for using and configuring Android Lint in its documentation. See <https://developer.android.com/studio>; <https://developer.android.com/studio/write/lint>.

Plaintiff reserves the right to supplement its position as to infringement following further discovery, including disclosure of new information or knowledge regarding the structure, function, operation, implementation, and design of the Accused Instrumentalities.

II. Claim Chart

Attached hereto as Exhibit A, and incorporated by reference herein, is a claim chart identifying where each element of the asserted claim of the '925 Patent is found in the Accused Instrumentalities.

III. Priority

The asserted claim of the '925 Patent is entitled to a priority date no later than June 25, 2013, based on the filing date of U.S. Provisional Patent Application No. 61/839,334 ("334 Provisional"). The '925 Patent is a continuation of U.S. Patent Application No. 14/313,890, which was filed on June 24, 2014 (now U.S. Patent No. 9,501,382) and claims priority to the '334 Provisional.

IV. Documents

A copy of the '925 Patent, its file history, and documents related to conception and reduction to practice are being concurrently produced. See PRF000001-1420.

Dated: May 26, 2022

Respectfully submitted,

/s/ Halima Shukri Ndai

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COUNSEL FOR PLAINTIFF

PURDUE RESEARCH FOUNDATION

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via e-mail on May 26, 2022.

/s/ Halima Shukri Ndai

Halima Shukri Ndai

EXHIBIT A

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